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## **EXHIBIT B**

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## Briggs: Here's why Toledo D-line coach Craig Kuligowski got sent home from bowl game and fired



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8:24 PM

Only the most sleuthing Toledo fan would have noticed the change on the university's athletics website.

One day last week, Craig Kuligowski was listed as the top assistant on the football staff.

The next, his name and bio had disappeared.

Kuligowski — the Toledo alum and recently enshrined Varsity T Hall of Famer who is widely regarded among the top defensive line coaches in the nation — was gone, quietly and without explanation.

What gives?

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As we've since learned, Kuligowski has been fired for cause after the university alleged that he "committed a significant and/or intentional violation" of its non-retaliation and standards of conduct policies, according to a copy of the coach's employment separation letter, obtained by The Blade through an open-records request.

Kuligowski's personnel file cited no further details, and Toledo athletic director Bryan Blair said only: "He's no longer employed here as of January 14, and we generally don't comment on personnel matters beyond that."

But our Toledo beat reporter, Kyle Rowland, and I have spent the past month snooping around.

And, according to three people familiar with the situation, the termination stems from an incident during Toledo's trip to Florida for the Boca Raton Bowl last month.

Kuligowski was drinking in the hospitality suite one night at the Boca Raton Marriott at Boca Center, sources said, when he spotted and verbally harassed a female UT staffer who earlier in the year had reported him for allegedly making an inappropriate comment. (There is no record of the previous allegation in the personnel file.)

Blair sent Kuligowski home from the bowl site — the coach was not at the game on Dec. 20 — and, after a brief university investigation, he was fired. Kuligowski, 54, had one year remaining on his contract, which featured a base salary of \$162,786 and an annual retention bonus of \$15,214.

Reached for comment, Kuligowski said: "My legal advice has been to not give any statements or interviews to any news media."

The parting marks a stunning end to what had been a feel-good homecoming.

Kuligowski, a 1991 graduate of UT, was a two-time all-Mid-American Conference offensive lineman for the Rockets, and he coached at his alma Case: 3:24-cv-00626-JRK Doc #: 1-5 Filed: 04/05/24 4 of 5. PageID #: 53 mater from 1992 to 2000.

From there, he followed Gary Pinkel to Missouri, where he became known as something of a defensive line guru. He coached five first-round NFL picks in 15 years with the Tigers, along with 2013 Southeastern Conference defensive player of the year Michael Sam.

Kuligowski then spent two years at Miami and a season at Alabama working for his old college coach, Nick Saban.

He was fired after one season at Alabama but, after a year off, he returned to Toledo in 2020 as assistant head coach and co-defensive coordinator.

In his cover letter applying for the job, he enthusiastically wrote: "I look forward to making Toledo great again!"

And, to his credit, Kuligowski — along with another high-profile coup, former Mount Union coach Vince Kehres — helped turn around the Rockets' defense.

UT went from last in the MAC in the total defense in 2019 to first or second each of the past three years.

Just last autumn, Kuligowski was inducted into the 2022 class of the Varsity T Hall of Fame.

He was - and remains - a Toledo legend.

But, of course, football success is not everything.

More important is promoting a workplace environment where everyone feels comfortable.

While no one should be defined by their worst moments, actions are not without consequences.

Credit could go to the University of Toledo. How many universities would have sided with a powerful football coach and looked the other way? I'd hazard to suggest a good number of them.

Toledo appears to be sending a clarion message of another kind.

No one is above the standards of decency.

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Sports Writer Kyle Rowland contributed to this report.

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